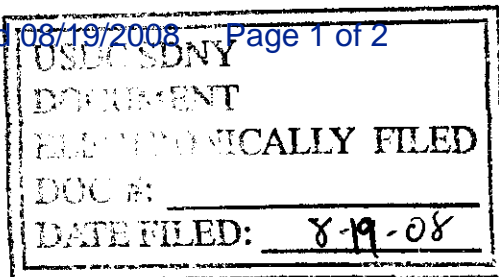


MINTZ & FRAADE, P.C.
COUNSELORS AT LAW
488 MADISON AVENUE
NEW YORK, NEW YORK 10022

TELEPHONE
(212) 486-2500

TELECOPIER
(212) 486-0701



OF COUNSEL
JAY D. FISCHER
EDWARD C. KRAMER
KEVIN J. MCGRAW
ARTHUR L. PORTER, JR.
JON M. PROBSTEN
SEYMOUR REITKNECHT
I. FREDERICK SHOTKIN

August 18, 2008

Via Facsimile

Hon. Henry Pitman
Chief U.S. Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 640
New York, NY 10017

Re: Scantek Medical, Inc. v. Sabella, et al. 08
Civ. 453 (CM) (HBP) (the "Lawsuit")

Dear Judge Pitman:

The undersigned, Mintz & Fraade, P.C. ("M&F"), which is also a party to this Lawsuit and which represents the Plaintiff and Third Party Defendants Dr. Zsigmond L. Sagi and Gibraltar Global Marketing, LLC, with respect to the Lawsuit, together with the undersigned Law Offices of Edward C. Kramer, P.C. which represents M&F and its principals Alan P. Fraade ("Fraade"), and Frederick M. Mintz ("Mintz") and Mintz & Fraade Enterprises, LLC, a limited liability company in which Fraade and Mintz are members, respectfully submit the following.

We are in receipt of the Defendant's Reply to our Opposition to the Defendant's Application for a protective order directing that the Defendant and Third Party Plaintiff Angela Chen Sabella's deposition be conducted telephonically (the "Application"), which we received at approximately 11:55 p.m. on Friday, August 18, 2008. In spite of the fact that the scheduling of Defendant's Application did not provide for us to have an opportunity to respond to Defendant's Reply, based upon Defendant's Reply, we believe that we should be given an opportunity to respond, and we believe that our response would facilitate the

Court's review. If our request to submit a response is granted, we shall respond within three (3) business days of our receipt of your Honor's response to this letter.

Respectfully submitted,



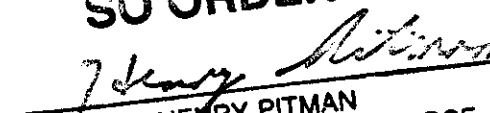
Alan P. Fraade

cc: Kenneth Sussmane, Esq.

APF/gtk

Application granted in part. Plaintiff and Third Party Defendants are to fax their response to my Chambers no later than 5:00 pm August. 20, 2008.

SO ORDERED


HENRY PITMAN
UNITED STATES MAGISTRATE JUDGE